

**Rio Mesa Solar Electric Generating Facility (RMSEGF)
(11-AFC-4)
Applicant's Specific Comments on the Preliminary Staff Assessment**

VISUAL RESOURCES

SPECIFIC COMMENTS

1. **Page 4.13-10, Third Full Paragraph, Second Sentence:** The “Cibola NWR estimates typical average visitation to be approximately 45,000/year, virtually all of whom are attracted at least in part by the outstanding scenic qualities of the river and refuge.” Applicant suggests revising this sentence as follows:

Cibola NWR estimates typical average visitation to be approximately 45,000/year. Based on the type of user, amount of use, and assumed level of public interest in Cibola NWR, the visual sensitivity of a viewer within the river and refuge portions of the NWR is considered high. While the Project is visible from the actively farmed areas within the Cibola NWR, it is not visible from the river and large portions of the wildlands areas of the refuge. ~~, virtually all of whom are attracted at least in part by the outstanding scenic qualities of the river and refuge. Visual sensitivity of the NWR is thus considered to be high.~~

2. **Page 4.13-11, A. Scenic Vistas, Third Paragraph, First Sentence:** LTVA is not a designated scenic vista. Please delete from section.
3. **Page 4.13-11, A. Scenic Vistas, Fourth Paragraph, Third Sentence:** This criteria involves designated scenic vistas, not “scenic values.” Scenic value is not a recognized or defined term under CEQA.
4. **Page 4.13-12, Visual Character or Quality Subsection:** The following is a summary of the visual character issues discussed in Applicant’s Visual Resources Appendix 2.

In each of the findings for viewer sensitivity, we suggest adding a description to the impact determination to acknowledge the relative limited amount of exposure (as a factor of population) that the Project would receive. Then compare this figure to other population centers both within Riverside County specifically, and then as a measure of the combined population of Riverside and Imperial Counties. This speaks to the flaw in the analytical method which fails to clearly establish the applicable threshold to measure at what level of exposure (as a measure of population) an impact becomes significant (See Appendix *Visual Resources* 2). The PSA does not disclose the scale used to characterize the number of viewers as low, medium or high. It is important to view the context of the population that surrounds the Project within the Palo Verde Valley and greater Riverside and Imperial Counties as this demonstrates the comparatively low level of population that exists within 10 and 20 miles of the project as compared to more densely populated regions of those counties. As such, the information below is presented for context and should be incorporated into the FSA in order to set a proper context for Staff’s impact analysis.

Table 1

Population	Distance to Project Power Towers
328	8 miles
21,217	20 miles
Source: US Census, 2010. URS, 2012.	

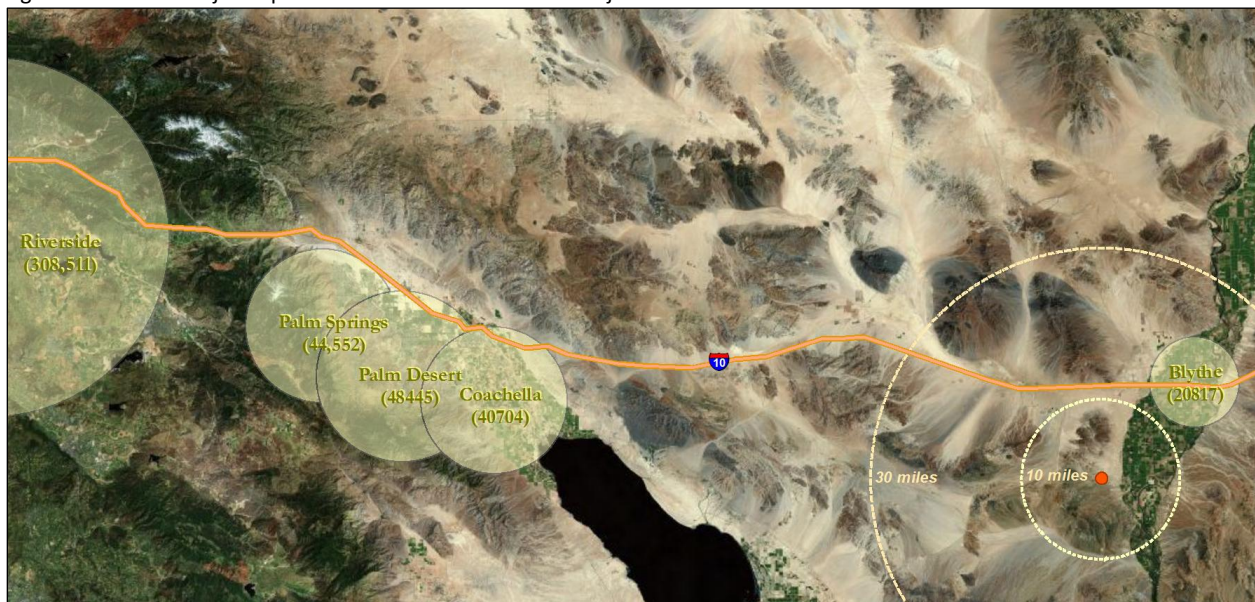
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Table 2

Municipal or County Population Center	Population Total (US Census, 2010)	Represented as Percent of Population (328 people) within 8 miles of the Project
Blythe	20,817	1.57%
Coachella	40,704	0.80%
Palm Desert	48,445	0.67%
Palm Springs	44,552	0.73%
Riverside	308,511	0.10%
Riverside County	2,189,641	0.014%
Imperial County	174,528	0.18%
Riverside and Imperial Combined	2,364,169	0.013%
Source: US Census, 2010. URS, 2012.		

Figure 1 – Several Major Population Centers in Relation to Project Power Towers



The PSA identifies sensitive viewers within the Palo Verde Valley as residents in around Palo Verde and Ripley and motorists on SR-78.

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5. **Page 4.13-12, C. Visual Character or Quality, Second Paragraph, Second Sentence:** Applicant will provide specific comments within its assessment of Appendix TT1 to the PSA.
6. **Page 4.13-12, C. Visual Character or Quality, Third Paragraph:** It is difficult to discern which specific KOPs would be substantially degraded by the Project because the analysis that follows never states "This KOP would be substantially degraded by the project," nor does it explain why the impact represents "substantial degradation." A significant adverse visual impact must be more than a change in visual character or quality, it must also cause "substantial degradation" to rise to the level of a significant impact.
7. **Page 4.13-14, C. Visual Character or Quality, Operational Impacts and Mitigation, Second Paragraph, First Sentence:** The PSA phrase "most *vulnerable* viewing group" (emphasis added) is subjective value-laden terminology. The sentence should instead demonstrate that the KOP is representative of views from the nearest residences.
8. **Page 4.13-15, C. Visual Character or Quality, Visual Sensitivity, First Paragraph, Fourth Sentence:** The KOP was intended to be a near foreground view, and is typical of the near foreground. For the PSA to characterize the KOP as "not typical" reflects a misunderstanding of the purpose of selecting KOPS at different viewing distances and thus skews the PSA's analysis.
9. **Page 4.13-15, C. Visual Character or Quality, Visual Sensitivity, First Paragraph, Last Sentence:** KOP 4 is typical of views from middle foreground.
10. **Page 4.13-15, C. Visual Character or Quality, Visual Quality, First Sentence:** There is no definition of which views or which KOP is affected. Analysis does not adhere to an assessment of individual KOPs.
11. **Page 4.13-15, C. Visual Character or Quality, Viewer Concern, First Sentence:** The views from most residences are obscured. Please characterize the concern from viewers of those residences as low.
12. **Page 4.13-15, C. Visual Character or Quality, Viewer Concern, Second Sentence:** Please define the PSA phrase "substantial number", and describe which of these recreationists are represented by each KOP.
13. **Page 4.13-15, C. Visual Character or Quality, Viewer Exposure, First Paragraph, First Sentence:** Rather than stating viewer numbers for each KOP, as is typical CEQA practice, the PSA instead combines the viewer numbers of a larger undefined area, thus inflating the viewer numbers for any single KOP. Even aggregated, however, 20-30 residents (many of whom do not have views of the project) do not constitute a "moderate" number of viewers according to CEC precedent, contrary to what is stated in the PSA and inconsistent with the conclusion on Table 1 page 4.13-30 of the PSA. Compare, for example, the Staff's conclusion in the Russell City Energy Center PSA that at KOP 6, with 34 two story homes, "The number of residences that would potentially have views of the project would be low." (RCEC FSA, p. 4.11-10)
14. **Page 4.13-15, C. Visual Character or Quality, Viewer Exposure, First Paragraph, Second Sentence:** The PSA should indicate that residential exposure would be zero because views of the site are blocked for most residences.

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15. **Page 4.13-15, C. Visual Character or Quality, Viewer Exposure, First Paragraph, Third Sentence:** There is not reasonable basis for the PSA's conclusion that 2250 ADT is "customarily considered by staff to represent moderate viewer *exposure*" (emphasis added) when 40 percent of the motorists are over-the-road truckers. Exposure is a function of the number of viewers, type of viewers, and duration of view and visibility. The PSA does not address duration of view or the visibility of the project, which is 10 miles away from the motorists.
16. **Page 4.13-16, C. Visual Character or Quality, Viewer Exposure, Last Sentence:** The PSA should address the visual sensitivity of each KOP individually, not collectively. Moreover, the term "portion of the viewshed" is a subjective characterization and should be replaced by individual KOP assessments.
17. **Page 4.13-16, Visual Change, Third Sentence:** This sentence appears to reject the typical KOP approach and instead substitutes subjective impressions of views from undisclosed viewpoints. Whether other features would be visible at these other viewpoints is speculation absent objective analysis and documentation.
18. **Page 4.13-16, Staff Note on Visual Simulations:** All simulations prepared for the AFC were prepared per CEC guidelines. Visual simulations were re-verified once the PSA came out. All simulations and models can be provided to the CEC directly for verification, if requested.
19. **Page 4.13-16, Visual Contrast, First Sentence:** Please clarify which KOP is being discussed here.
20. **Page 4.13-16, Visual Contrast, Second Sentence:** Please define the PSA term "massive." Such definition should take into account the fact that the towers occupy a very small percentage of the field of view.
21. **Page 4.13-16, Visual Contrast, Third Sentence:** Mass is a function of height, width and depth. Only height is addressed in this context. While the towers will be tall, they are also quite thin when viewed from middleground and background distances.
22. **Page 4.13-17, Second Paragraph, First Sentence:** Please provide the specific distance and which KOP is being described.
23. **Page 4.13-17, Visual Dominance, First Sentence:** This section of the PSA is describing three different KOPs with different distances, perspectives and different visual elements. Therefore it is inaccurate and misleading to lump all three KOPs together in a broad generalization. When the PSA discusses the immediate field of view, please define the KOP.
24. **Page 4.13-17, View Blockage, Second Paragraph, First Sentence:** Please define which viewpoints.
25. **Page 4.13-17, View Blockage, Second Paragraph, Second Sentence:** The PSA has combined several KOP's, and therefore the analysis is invalid.
26. **Page 4.13-17, View Blockage, Second Paragraph, Third Sentence:** Please define which KOP has a visual sensitivity of "moderately high", and where visual change is "high". Please define which specific KOPs, if any, would be substantially degraded and by what criteria.
27. **Page 4.13-18, Mitigation, Second Paragraph, First and Second Sentence:** Please define the PSA phrase "other sensitive view location".

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28. **Page 4.13-19, Viewer Concern, Second Paragraph, Second Sentence:** Define the number of residences.
29. **Page 4.13-19, 5th Paragraph, Second Sentence:** Visitation estimates at Jack E. Marlowe Park in Ripley seem unreasonably high at over 100/day since Ripley has a population of approximately 330 people. On what basis does the PSA conclude that nearly one third of Ripley's population visits the park every day? Please provide documentation or source for this information.
30. **Page 4.13-20, First Sentence:** Please define how many residences, if any, will have any view at all from indoor or outdoor living spaces.
31. **Page 4.13-21, I-10 KOPs Subsection:** The PSA identifies three categories of sensitive viewers from I-10: residents of Mesa Verde; viewers at Blythe Airport; and travelers on I-10. The Visual Sensitivity and Visual Change analysis then describes the level of visual resource change from residences of Mesa Verde interchangeably with views from motorists on I-10. The PSA should, but does not, recognize there are different viewer sensitivities for different groups of viewers within the analysis.
32. **Page 4.13-21, View Blockage, Second Paragraph:** The PSA does not present the visual simulation of the KOP from which the impact is alleged to be significant. Please provide.
33. **Page 4.13-22, Fifth Paragraph, Third Sentence:** The statement that the view from I-10 would represent a long period of exposure for motorists is subjective. The Traffic and Transportation section of the PSA, **Page 4.11-6, 4rd Paragraph, Second Sentence** states, "In the project area, I-10 has two lanes in each direction and a speed limit of 70 miles per hour. Trucks comprise approximately 39 percent of the traffic in the project area." If the total ADT heading eastbound on I-10 is 39% truck traffic, this means that approximately 9,282 of those viewers will be from non-truck traffic. This is a proportionally small percentage exposure when the true nature of the primary user is explored. If the total ADT heading westbound on I-10 is 39% truck traffic, then approximately 8,775 of these viewers will be non-truck traffic. This is a proportionally small percentage of the total exposure and should be recognized as such in the PSA.

Additionally, the basis of the PSA conclusion that the length of time exposed to the Project can be considered a "long period of exposure" is unclear and should be explained. Moreover, please explain the metric used to determine whether this period is long, moderate, or short-term. I-10 travels roughly 1,200 miles through the Basin and Range Physiographic Province. If the Project were visible for 30 miles along I-10, this would represent 2.5% of the total area of I-10 within that Province. Using measures of exposure from the PSA, if the Project were visible for 15 miles, this would represent 1.2% of the total area of I-10 located within the Basin and Range Physiographic Province.

Finally, the PSA fails to describe the period of time the project will be in the drivers' field of vision and the fact that the drivers' primary focus will be on the roadway while driving amidst truck traffic at high rates of speed. The reader cannot accurately assess the true significance of project impacts without consideration of this information.

34. **Page 4.13-25, Third Paragraph, Fifth Sentence:** Please provide a citation for the PSA estimate of 8,800 annual visitor days for use of the Bradshaw Trail in the vicinity of the Project, and the PSA conclusion that this annual number represents an average of 24 visitors per day. Elsewhere in

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the PSA an ADT of 2,200 vehicles is described as “moderate.” How then, can 24 visitors per day also be considered “moderate to moderately high,” as stated in the PSA?

35. **Page 4.13-28, Last Paragraph: Please correct this sentence as follows:** KOP5 is taken from a point near the northern boundary of the Cibola National Wildlife Refuge (Cibola NWR). The correct distances are 5.6 miles to the south of the project boundary, and 6.6 miles to the northeast solar tower.
36. **Page 4.13-34, D. Light and Glare, Facility Surfaces, Third Paragraph, Last Sentence:** If every residence within 8.5 miles can request trees be planted, which locations and sensitive receptors would not be reduced. In addition, Visual Staff needs to coordinate with Biology and Water Supply Staff to discuss and define appropriate trees that would not result in unintended adverse impacts.